

From: Emily Taylor <etaylor@watsonroach.com>
Date: August 23, 2024 at 3:31:26 PM EDT
To: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>, heather@hmccivilrights.com, Erica Runnels <erica@hmccivilrights.com>
Cc: JCPDteam <JCPDteam@hmccivilrights.com>, danny <danny@moorerader.com>, Maria Ashburn <mashburn@watsonroach.com>, Rachel Nottingham <rachel@hbm-lawfirm.com>, jlakey <jlakey@bpjlaw.com>, Aaron Wells <awells@rswlaw.com>, "Kristin E. Berexa" <kberexa@fbb.law>, "Ben C. Allen" <ballen@fbb.law>, kgrant <kgrant@rswlaw.com>, L Rufolo <lrufolo@rswlaw.com>
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' Verizon Subpoena re Mike Street

Vanessa,

At this point, it would probably be easier/take less time for me to file my motion for a protective order instead of engaging in any more back and forth regarding this subpoena. As I said, he retired in March of 2017. I cannot fathom how any of his personal cell phone records would be relevant to your claims.

Have a good weekend,

Emily

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Friday, August 23, 2024 12:38 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: JCPDteam <JCPDteam@hmccivilrights.com>; danny <danny@moorerader.com>; Maria Ashburn <mashburn@watsonroach.com>; Rachel Nottingham <rachel@hbm-lawfirm.com>; jlakey <jlakey@bpjlaw.com>; Aaron Wells <awells@rswlaw.com>; Kristin E. Berexa <kberexa@fbb.law>; Ben C. Allen <ballen@fbb.law>; kgrant <kgrant@rswlaw.com>; L Rufolo <lrufolo@rswlaw.com>
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' Verizon Subpoena re Mike Street

Emily,

Thanks for providing this additional information. Can you confirm that Mike Street never worked for or with DEA in any capacity during his tenure with JCPD? Can you also confirm that he never worked any investigation in which Sean Williams served as a confidential source? You state that he was never involved in any investigation involving my clients, but was he involved in any investigation involving Williams?

-Vanessa

Sent from my iPhone

On Aug 23, 2024, at 8:35 AM, Emily Taylor <etaylor@watsonroach.com> wrote:

Vanessa,

When we spoke about this subpoena, I believe I told you that the number ending in 5869 was the *JCPD*-issued phone number for retired JCPD Captain Mike Street. This is actually his personal phone number. Mike Street retired from JCPD on March 31, 2017. He has not worked for JCPD (or to my knowledge any law enforcement agency) since that day. He was not involved in any investigations involving your clients. Any calls on Mr. Street's personal cell phone for the dates you have in the subpoena were made in his personal capacity and are not relevant to any of your clients' claims.

Please advise as to if you agree to withdraw Mr. Street's number from your subpoena. I am trying to narrow the issues for the Court to rule on so that we do not waste the Court's time.

Thank you,

Emily

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 3:48 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: JCPDteam <JCPDteam@hmccivilrights.com>
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena

Emily,

I appreciate your time today. Just to recap, I stated during the meet and

confer that we were no longer comfortable going through the City for third party subpoenas because of numerous examples now where we have received untimely and incomplete discovery from the City. I agreed to designate any phone records we receive from these subpoenas confidential initially and then work with the City on redacting any personal, nonrelevant data before de-designating any portion of the call logs. You stated that the City would be filing a motion for protective order regarding the JCPD issued phone numbers and Hilton's personal cell phone number, but not regarding the phone number (423) 356-3616. Although this did not come up, I assume you likewise will not be moving regarding the ATT subpoena which is also for a non-JCPD phone number.

Have a good evening,
Vanessa

On Mon, Aug 12, 2024 at 12:04PM Emily Taylor

<etaylor@watsonroach.com> wrote:

Yes. That is better for me as well.

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 2:58 PM
To: Emily Taylor <etaylor@watsonroach.com>
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena

Emily,

Could we push this back to 12:15? Best number for me is (510) 500-9634.

Thanks,
Vanessa

On Mon, Aug 12, 2024 at 11:45AM Emily Taylor

<etaylor@watsonroach.com> wrote:

Vanessa -

I don't think anyone else will be joining us. Send me the best number to reach you, and I will contact you directly.

Thanks,

Emily

From: Vanessa Baehr-Jones
<vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 1:07 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: Erica Russell <erica@hmccivilrights.com>; danny

<danny@moorerader.com>; jlakey <jlakey@bpjlaw.com>; Kristin E. Berexa <kberexa@fbb.law>; kgrant <kgrant@rswlaw.com>; Ben C. Allen <ballen@fbb.law>; andre@moorerader.com <andre@moorerader.com>; L Rufolo <lrufolo@rswlaw.com>; Aaron Wells <awells@rswlaw.com>; Marie Chrisman <mchrisman@bpjlaw.com>; Maggie Sutton <msutton@fbb.law>; Maria Ashburn <mashburn@watsonroach.com>; Sandy Vite <sandy@hbm-lawfirm.com>; Heather Collins <heather@hmccivilrights.com>; Elizabeth Kramer <elizabeth@eko.law>; Kevin Osborne <kevin@eko.law>; Julie Erickson <julie@eko.law>; Linda Oxford <linda@eko.law>; Ashley Walter <ashley@hmccivilrights.com>; Iliana Arbeed <iliana@eko.law>

Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena

Emily,

I am available for a meet and confer at 3 pm Eastern today.

Can you circulate a conference line if you anticipate others joining?

Thanks,
Vanessa

Sent from my iPhone

On Aug 12, 2024, at 9:57 AM, Emily Taylor
<etaylor@watsonroach.com> wrote:

Vanessa,

Respectfully, this is not a true third-party subpoena as to three of the numbers. The subpoena also seeks information that you have not requested in a discovery request. If you do not intend to honor our prior agreement regarding Verizon records for JCPD employees, I request a meet and confer before you issue the subpoena. I am available this afternoon between 3pm and 5pm ET or tomorrow morning between 10am ET and 1pm ET.

Thank you,

Emily

From: Vanessa Baehr-Jones
<vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 12:49 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: Erica Russell <erica@hmccivilrights.com>; danny
<danny@moorerader.com>; jlakey
<jlakey@bpjlaw.com>; Kristin E. Berexa
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Julie Erickson <julie@eko.law>; Linda Oxford
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<ashley@hmccivilrights.com>; Iliana Arbeed
<iliana@eko.law>
Subject: Re: BP, HA, and SH v. City of Johnson City et
al.: Plaintiffs' AT&T Subpoena

Emily,

Thank you for the offer but we will be serving this subpoena and all other third party subpoenas issued on behalf of Plaintiffs ourselves going forward.

-Vanessa

Sent from my iPhone

On Aug 11, 2024, at 1:46 PM, Emily Taylor
<etaylor@watsonroach.com> wrote:

Plaintiffs' Counsel:

Three of these numbers are either personal or work phones for three JCPD employees. Pursuant to our prior agreement regarding the Verizon records, I request that you allow me to send the subpoena out on Monday for the following numbers:

1. 423-483-5891 (JC issued phone)
2. 423-483-5869 (JC issued phone)
3. 423-292-3363 (Personal Phone for David Hilton)

Pursuant to our agreement, I will designate the JCPD issued records "Confidential" and the personal records "Attorney's Eyes Only." Given that we are only dealing with a few numbers, it shouldn't take me more than a few days to get the records to you once I receive them.

While the 4th is not a JCPD number (to my knowledge), I am happy to include that one on my subpoena to save you from having to send one out as well.

Let me know if you are agreeable to this, and I will make sure the subpoena goes out on Monday.

Thanks,

Emily

Emily C. Taylor
[865-637-1700](tel:865-637-1700) (office)
[865-525-2514](tel:865-525-2514) (fax)
etaylor@watsonroach.com

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[<image005.png>](#) [<image006.png>](#) [<image007.png>](#)

Watson, Roach, Batson, Rowell & Lauderback, P.L.C.
P. O. Box 131
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From: Erica Russell
<erica@hmccivilrights.com>
Sent: Friday, August 9, 2024 12:11 PM
To: danny <danny@moorerader.com>;
Emily Taylor
<etaylor@watsonroach.com>; jlakey
<jlakey@bpjlaw.com>; Kristin E. Berexa
<kberexa@fbb.law>; kgrant
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<ashley@hmccivilrights.com>; Iliana
Arbeed <iliana@eko.law>
Subject: BP, HA, and SH v. City of
Johnson City et al.: Plaintiffs' AT&T
Subpoena

Good morning,

Attached please find a subpoena to
AT&T for service on Monday, August 12.

Thank you,

<image001.png>
<image010.png>

Erica Russell

OFFICE MANAGER &
SR. PARALEGAL

615.724.1996

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Dr. #320

Brentwood, TN 37027

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Vanessa Baehr-Jones

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